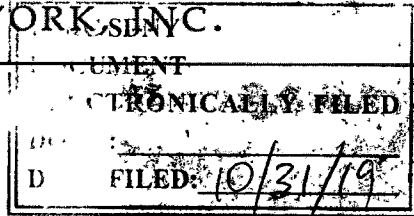


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Southern District of New York
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October 31, 2019

By ECF

Honorable Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. David Wagner*, 19 Cr. 437 (AKH)

Dear Judge Hellerstein:

I write on consent (Assistant United States Attorney Jilan Kamal and U.S. Pretrial Services Officer Francesca Tessier-Miller) to respectfully request that the Court modify the curfew condition to allow Mr. Wagner to work nights at a call-center for the American Automobile Association. Specifically, I request that the curfew – which currently runs from 11:00 p.m. to 7:00 a.m. – be extended so that it runs from 2:00 a.m. to 7:00 a.m. Mr. Wagner is scheduled to begin work on November 4, 2019.

Mr. Wagner, who was arrested on June 14, 2019, has been wholly compliant with the conditions of his release, which include a \$500,000 personal recognizance bond co-signed by Mr. Wagner's wife and three adult children, and secured by property in Narragansett, Rhode Island.

Thank you for your consideration of this request.

Respectfully submitted,

/s/
Martin S. Cohen
Ass't Federal Defender
Tel.: (212) 417-8737

cc: Jilan Kamal, Esq.
Sagar Ravi, Esq.
Francesca Tessier-Miller, U.S. Pretrial Services Officer